

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

RESIDENTIAL CAPITAL, LLC, et al.,  
Debtors.

Case No. 12-12020 (MG)  
Chapter 11  
Jointly Administered

Objection Date: February 23, 2023@ 4:00 p.m. (ET)  
Hearing Date: March 2, 2023@ 10:00 a.m. (ET)

**CERTIFICATE OF NO OBJECTION TO PLAINTIFFS' *CORRECTED* MOTION  
AND MEMORANDUM OF LAW OF THE *ROTHSTEIN* PLAINTIFFS (CLAIM  
NOS. 4074 AND 3966) TO PERMIT FINAL DISTRIBUTION  
OF FUNDS AND *CY PRES* DESIGNATION**

Landon Rothstein, Jennifer Davidson, Robert Davidson, and Ihor Kobryn, individually and on behalf of the putative class (collectively, the “Rothstein Plaintiffs” or “Plaintiffs”) (Claim Nos. 4074 and 3966), hereby submits this Certificate of No Objection to Plaintiffs’ *Corrected* Notice of Motion and Memorandum of Law of the *Rothstein* Plaintiffs (Claim Nos. 4074 and 3966) to Permit Final Distribution of Funds and *Cy Pres* Designation (the “Certificate”), pursuant to Local Bankruptcy Rule 9075-2 and respectfully states:

1. On February 8, 2023, Plaintiffs’ *Corrected* Notice of Motion to Permit Final Distribution of Funds in the *Rothstein* Class Action Settlement (Claim Nos. 4074 and 3966) and *Cy Pres* Designation was filed as Document Number 10747 (the “Motion”).

2. On February 8, 2023, notice of the Motion was provided via ECF and served by electronic mail to parties and claimants listed on Exhibit A of the Motion’s *Corrected* Certificate of Service [Doc. No. 10748]. On February 9, 2023, notice of the motion was served by First Class United States Mail to parties and claimants listed on Exhibit B of the Motion’s *Corrected* Certificate of Service [Doc. No. 10748].

3. The deadline for filing an objection or response to the Motion expired on February 23, 2023 (the “Objection Deadline”).

4. The Objection Deadline has now passed, and counsel has reviewed the case docket not less than 48 hours after expiration of the Objection Deadline and is not aware of any objections, responsive pleadings, or request for hearing with respect to the Motion that have been filed with the clerk or served on counsel for the Plaintiffs.

5. The Plaintiffs respectfully request that the Court enter an order granting the Motion without further pleading or hearing. A copy of the Proposed Order that was attached to the Motion, is submitted with this Certificate.

Dated: February 27, 2023  
New York, NY

Respectfully submitted,

**KIRBY McINERNEY LLP**

By: /s/ Thomas W. Elrod

Thomas W. Elrod  
250 Park Avenue, Suite 820  
New York, NY 10177  
Tel: (212) 371-6600  
Email: telrod@kmlp.com

**MARK A. STRAUSS LAW, PLLC**

Mark A. Strauss  
555 Madison Avenue, 5th Floor  
New York, NY 10022  
Tel: (212) 729-9496  
Email: mark.strauss@markastrausslaw.com

*Plaintiffs' Counsel*

*and*

**HOGAN McDANIEL**

Garvan F. McDaniel  
1311 Delaware Avenue  
Wilmington, DE 19806  
Tel: (302) 656-7540  
Email: gmcDaniel@dkhogan.com

*Plaintiffs' Special Bankruptcy Counsel*